REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-10, 15-18, 21-23 and 29 are pending in the present application, Claims 1-10, 15-18, 21, and 22 having been amended, Claims 11-14, 19, 20, and 24-28 having been canceled without prejudice or disclaimer, and Claim 29 having been added. Support for the present amendment is found, for example, Figs. 4, 7, 24, and 25, and at paragraphs [0019]-[0021], [0023]-[0025], [0049], [0059], and [0062]-[0064] of the originally filed specification. New Claim 29 is similar to Claim 6, but does not recite means-plus-function terminology. Applicant respectfully submits that no new matter is added.

In the outstanding Office Action, Claims 6, 7, 17, 18, and 21 were rejected under 35 U.S.C. §102(e) as anticipated by Chang et al. (U.S. Patent Publication No. 2004/0100976, hereinafter Chang); and Claims 1-5, 8-16, 19, 20, and 22-28 were rejected under 35 U.S.C. §103(a) as unpatentable over Chang in view of Kokado et al. (U.S. Patent Publication No. 2003/0115327, hereinafter Kokado).

With respect to the rejection of Claim 6 as anticipated by Chang, Applicant respectfully submits that the amendment to Claim 6 overcomes this ground of rejection. Amended Claim 6 recites, *inter alia*,

> ***an address translation unit including***,
>
> > means for translating an address ***in accordance with an address translation rule***, in order to transfer information from a terminal on the global network to a terminal on the private network, and
>
> > means for translating an address in accordance with a rule established on a per sending device basis, in order to transfer information from a terminal on the private network to a terminal on the global network; and
>
> > a database unit for recording the address translation rule, wherein

> *the address translation rule associates a sending*
> *device and destination on the global network with a*
> *destination on the private network, and*
>
> *if a sending device and destination of the packet*
> *received at the WAN interface unit matches the sending*
> *device and destination on the global network of the*
> *address translation rule, the address translation unit*
> *translates the destination of the packet to the destination*
> *on the private network.*

Chang does not disclose or suggest every element of amended Claim 6.

Chang provides a dynamic network address translation system. A first device 102 is in a public network, and sends packets to second device 103, which is in a private network. A NAPT router 104 is used to connect first device 102 and second device 103. The NAPT router 104 includes a NAPT table 106 that stores corresponding data of network address translation.[1] A translation data item is added to the table 106, wherein the "translation data item correspond to a destination network address translation, which makes [destination IP address-destination port] to be translated from [outer IP address 11:data port 108] to [second IP address 117:service port 109]."[2]

First device 102 sends a connection request packet 114, whose destination port is data port 108. This packet is routed to router 104, which translates the [destination IP address:destination port] to [second IP address 117:service port 109].[3]

In other words, the translation performed by router 104 does not involve the IP address of the sending device (first device 102). Rather, the translation is based on the destination address:destination port (the public IP address and port of router 104) and the second IP address117:service port 109 (the private IP address of second device 103 and its port). The table 106 of Chang does not "associate *a sending device* and destination on the

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[1] Chang, paragraph [0026].
[2] Chang, paragraph [0033].
[3] Chang, paragraph [0035].

global network with a destination on the private network," and the table 106 of <u>Chang</u> is not

used to translate the destination of a packet to the destination on the private network "if a

sending device and destination of the packet received at the WAN interface unit matches the

sending device and destination on the global network of the address translation rule." <u>Chang</u>

does not use a "sending device" as described in amended Claim 1. Rather, <u>Chang</u> merely

uses the IP address/port of the router and the IP address/port of the second device in the

private network.

        Thus, <u>Chang</u> does not disclose or suggest the claimed

> the address translation rule associates a sending
> device and destination on the global network with a
> destination on the private network, and

> if a sending device and destination of the packet
> received at the WAN interface unit matches the sending
> device and destination on the global network of the address
> translation rule, the address translation unit translates the
> destination of the packet to the destination on the private
> network.

        In view of the above-noted distinctions, Applicant respectfully submits that Claim 6

(and any claims dependent thereon) patentably distinguish over <u>Chang</u>. Claims 21 and 29

recite elements analogous to those of Claim 6. Thus, Applicant respectfully submits that

Claims 21 and 29 patentably distinguish over <u>Chang</u> for at least the reasons stated for Claim

6.

        Claim 1 recites, *inter alia*,

> the address translation rule associates a sending
> device and destination on the global network with a
> destination on the private network, and

> if a sending device and destination of the packet
> received at the WAN interface unit matches the sending
> device and destination on the global network of the address
> translation rule, the address translation unit translates the
> destination of the packet to the destination on the private
> network.

Chang fails to disclose or suggest these features of amended Claim 1 for at least the reasons stated for Claim 6. Furthermore, Kokado fails to cure the deficiencies in Chang. The outstanding Office Action relies on Kokado to describe an "access control unit," and not the "address translation unit." Paragraphs [0191]-[0192] of Kokado describe an address conversion function. Particularly, paragraph [0192] states "converts the destination address GA and the destination port number 21 to an LA and an LP21 for the FTP server 2." However, this section of Kokado does not disclose or suggest the above-noted features of amended Claim 1.

In view of the above-noted distinctions, Applicant respectfully submits that Claim 1 (and any claims dependent thereon) patentably distinguish over Chang and Kokado, taken alone or in proper combination. Claims 11 and 22 recite elements analogous to those of Claim 1. Thus, Applicant respectfully submits that Claims 11 and 22 patentably distinguishes over Chang and Kokado, taken alone or in proper combination, for at least the reasons stated for Claim 6.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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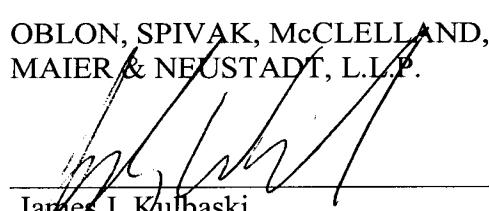
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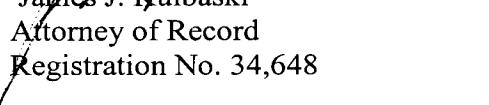
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17